



RECEIVED

APR 17 2008

Environmental  
Cleanup Office

AsD5F  
20.1

5219 N. Shirley St., #100  
Ruston, WA 98407  
P: (253) 752-2185  
F: (253) 752-7083  
www.pointruston.com

April 15, 2008

Mr. Kevin L. Rochlin  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue, ECL-111  
Seattle, WA 98101

RE: Monthly Report: No. 142, March 2008  
Operable Unit No. 02  
Asarco Tacoma Smelter Site

Dear Mr. Rochlin:

Point Ruston is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. Point Ruston will continue to provide monthly reports to EPA for the site organized in the same manner as previous reports prepared by Asarco to follow item (a) through (g) of this paragraph.

If you have any questions, please call me.

Sincerely,

Sue O'Neill  
Site Manager

Attachment (2 copies)

cc: Chung Ki Yee - Washington Department of Ecology  
Evan Griffiths - CH2MHill (2 copies)  
Richard Kauffman - ATSDR c/o U.S. EPA Region 10  
Leslie Ann Rose - Citizens for a Healthy Bay

USEPA SF



1301639

Monthly Report No. 142, March 2008  
Operable Unit 02  
Asarco Tacoma Smelter Site

A. *Actions taken to achieve compliance with the Consent Decree during the previous month.*

1. A regular monthly design review meeting was not held in February.
2. Amendments to Asarco's final Upland Remediation Design (September 2006) are being prepared consistent with the Second Amendment to the Consent Decree.
3. Remedial Action activities continued.

B. *Summary of sampling, tests, and all other data received or generated by Point Ruston in the previous month.*

1. Outfall activities including the following:

Section 2.3 of the Final Statement of Work (SOW) for Remedial Design and Remedial Action – Exhibit F to the Second Amendment requires Point Ruston to continue outfall monitoring. Outfalls will be monitored to determine if the monthly average surface water outfall concentrations for arsenic, copper, and zinc exceed 0.5 ppm at the North and South site outfalls until they are abandoned.

Weekly composite samples will be collected at each outfall during the construction season. During the winter season, outfall samples will be collected every other month. Asarco began the following schedule in May of 2003 which Point Ruston will continue to implement: weekly composite samples will be collected from May-October, and in December, February, and April. Outfall samples were not collected in March consistent with the schedule.

2. Point Ruston collects OCF leachate in a 5,000 gallon polyethylene tank for offsite shipment and disposal. LCRS and LDCRS volumes are monitored weekly in accordance with the draft OCF OMMP. LCRS volumes currently average approximately 209 gallons per day on the LCRS. Point Ruston shipped 4,750 gallons of leachate (6.1 ppm results attached) on March 10, 2007.

C. *Work Plans and other deliverables completed and submitted during the previous month.*

1. On March 5, 2008, Point Ruston received comments via e-mail from EPA on the Point Ruston Remediation Design submitted to EPA on January 31, 2008.
2. On March 25, 2008, Point Ruston received comments from EPA via e-mail on the Stack Hill Institutional Control Plan submitted to EPA on December 20, 2007.

Monthly Report No. 142, March 2008  
Operable Unit 02  
Asarco Tacoma Smelter Site

3. Remedial Action during March included the following tasks:

- OCF construction activities:
  - Maintained leachate collection system and shipped leachate for offsite treatment as necessary to maintain adequate storage capacity in the temporary storage tank.
- Stack Hill construction activities:
  - Maintained erosion and surface water controls
  - Continued development activities, began installation of dry utilities and pouring the foundation for the first model home
  - Hauled utility trench soils to lower site for use as cap materials
- Site-wide remediation activities:
  - Continued surface water controls
  - Maintained haul roads and stockpiles onsite
  - Maintained erosion and surface water controls

D. *Actions scheduled for the next six weeks.*

1. Point Ruston will submit responses to <sup>may</sup> EPA comments received on the Point Ruston Remediation Design on ~~March 5~~, 2008. A revised design will also be submitted incorporating revisions based on EPA comments received.
2. Point Ruston will submit responses to <sup>may</sup> EPA comments received on the Stack Hill Institutional Control Plan on ~~March 25~~, 2008. A revised Institutional Control Plan will also be submitted incorporating revisions based on EPA comments received.
3. The following Remedial Action tasks are planned to continue:
  - RA Monitoring:
    - Outfall sampling (weekly composite samples) during scheduled months
    - Air monitoring during remedial action activities
  - OCF construction activities:
    - Continue collection of leachate for offsite disposal
    - Continue monitoring of leachate volumes
  - Stack Hill construction activities:
    - Erosion controls and site maintenance
    - Continue development activities including dry utility installation, model home construction, and paving roads
  - Site-wide construction activities:
    - Continue surface water controls
    - Maintain roads and stockpiles onsite
    - Maintain erosion controls

Monthly Report No. 142, March 2008  
Operable Unit 02  
Asarco Tacoma Smelter Site

*E. Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.*

1. Point Ruston is completing permitting for the first phase of development on the lower site with the City of Tacoma.

*F. Modifications to work plans or schedules proposed to or approved by EPA.*

1. The Second Amendment to the Consent Decree was finalized and the sale of the property to Point Ruston LLC completed on October 31, 2006.

*G. Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.*

1. Point Ruston attends the Town of Ruston's Town Council meetings routinely to answer question or give briefings regarding the status of RA and development planning activities (1<sup>st</sup> and 3<sup>rd</sup> Monday of each month).
2. Point Ruston is working with the City of Tacoma on development plans which incorporate remediation components for the site.
3. Point Ruston is working with MetroParks to incorporate the capping component into the Peninsula Park design.
4. Point Ruston meets with the Town of Ruston, City of Tacoma and MetroParks to address operation, maintenance, and monitoring issues at the site.



ENERGY LABORATORIES, INC. \* 1120 S 27th St \* PO Box 30916 \* Billings, MT 59107-0916  
Toll Free 800.735.4489 \* 406.252.6325 \* FAX 406.252.6069 \* eli@energylab.com

## LABORATORY ANALYTICAL REPORT

**Client:** Point Ruston LLC  
**Project:** Tacoma Smelter OCF Leachate  
**Lab ID:** B08021613-001  
**Client Sample ID:** TSM020822

**Report Date:** 03/04/08  
**Collection Date:** 02/22/08 18:00  
**Date Received:** 02/26/08  
**Matrix:** Aqueous

Analyses	Result	Units	Qualifiers	RL	MCL/ QCL	Method	Analysis Date / By
<b>METALS, TOTAL</b>							
Arsenic	6.1	mg/L		0.1		E200.7	02/29/08 17:03 / rh

**Report** RL - Analyte reporting limit.  
**Definitions:** QCL - Quality control limit.

MCL - Maximum contaminant level.  
ND - Not detected at the reporting limit.